

CORRESPONDENCE CONTROL  
OUTGOING LETTER NO.

DOE ORDER #

00-RF-00492



DIST.	LTR	ENC
BENSUSSEN, S.J.		
BORMOUNI, A.M.		
BRILSFORD, M.D.		
BRYNER, C.J.		
BURDGE, L.		
CARD, R.G.		
COSGROVE, M.M.		
COX, C.M.		
CRAWFORD, A.C.		
DEJONG, V.J.		
FERRERA, D.W.		
FULTON, J.C.		
HARDING, W.A.		
MARTINEZ, L.A.		
PARKER, A.	X	X
POUSTON, S.		
SHELTON, D.C.		
TUOR, N.R.		

February 7, 2000

00-RF-00492

Henry F. Dalton  
Assistant Manager  
Facilities Disposition  
DOE, RFEO

MODIFICATION #2 TO THE BUILDING 776/777 DECOMMISSIONING OPERATIONS PLAN - AMP-040-00

Pursuant to Paragraph 127 of the Rocky Flats Cleanup Agreement (RFCA), the attached minor modification is being submitted for your approval and transmittal to the Colorado Department of Public Health and Environment (CDPHE).

This modification to the Decommissioning Operations Plan (DOP) is necessary to implement an agreement between the Site project points of contact and CDPHE, which provides for the partial closure of a Resource Conservation and Recovery Act (RCRA) regulated unit upon engagement of the consultative process and approval of the Lead Regulation Agency (LRA) (i.e., CDPHE). This agreement is documented in a January 24, 2000 Rocky Flats Environmental Technology Site (RFETS) Regulatory Contact Record, a copy of which is attached with this minor modification.

If you have questions, please contact Randy Walker at Extension 8269.

FOR CONTROL X X  
DMN RECORD  
RAFFIC  
ATST/130G

CLASSIFICATION:  
CNI  
UNCLASSIFIED X X  
CONFIDENTIAL  
SECRET

AUTHORIZED CLASSIFIER  
SIGNATURE

Alan M. Parker  
Vice President  
Closure Projects Integration

Attachments:  
As Stated

Orig. and 1 cc - Henry F. Dalton

CTION ITEM STATUS

PARTIAL/OPEN

CLOSED

TR APPROVALS:

RIG & TYPIST INITIALS

RJW:gjh

Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000  
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

ADMIN RECORD



IA- B776-A 00045

#### 4.5.1.3 Unit Removal without Onsite Treatment

Unit equipment or structures that are not decontaminated to meet either the "clean closure by decontamination" or "debris rule" standard will be removed, size-reduced (if necessary), and packaged to meet the waste acceptance criteria (WAC) of the approved disposal facility. In the event this waste cannot be shipped directly to a disposal facility, it will be stored in an approved on-Site storage unit until shipment can be scheduled.

#### 4.5.2 Closure Documentation

Prior to the decommissioning of each SET, RCRA unit-specific closure information will be submitted to the LRA for review and approval as a minor modification to this DOP under ¶127 of RFCA. The unit-specific information will include drawings and/or photographs of the RCRA-regulated unit or units in the SET, applicable EPA Waste Codes, the selected closure option(s), and closure requirements.

Consistent with Section 1.1.4 of the DPP, portions of a RCRA-regulated unit may be removed prior to submittal of the required unit-specific closure information upon engagement of the consultative process and concurrence of the LRA. In such cases, LRA concurrence will be documented in an RFETS Regulatory Contact Record, which will be filed in the Project Record.

Mod #2

A description of the closure activities completed for each RCRA-regulated unit will be included in the Final Closeout Report, which will be prepared for the Building 776/777 Closure Project upon completion of decommissioning activities. All RCRA units will be closed prior to building demolition.

#### 4.6 Pre-Demolition Survey

A pre-demolition survey will be conducted to identify areas requiring additional decontamination before the building is demolished. The pre-demolition survey will be performed on an on-going basis in areas that have been stripped out and released for final survey to verify the waste disposal path for building rubble. Per ¶60(a) of RFCA, the LRA may take samples and obtain duplicate, split, or sub-samples of any DOE samples.

The pre-demolition survey will be conducted in accordance with the Pre-Demolition Survey Plan, which will be prepared in conformance with the DDCP (Ref. 3) prior to the initiation of demolition activities. The Pre-Demolition Survey Plan will be submitted to the LRA for review and approval. A Pre-Demolition Survey Report will be prepared to document the results of the pre-demolition survey and included in the Project's administrative record (AR). Per Sections 3.3.10 through 3.3.13 of the DPP, the Pre-Demolition Survey Report will be forwarded to the LRA for review.

#### 4.7 Independent Verification

An independent party, selected by DOE, will perform a verification assessment of the final survey methodology. This assessment will include a review of survey procedures, survey instrument calibration and operation procedures, and the Pre-Demolition Survey Plan. Also, the independent party may obtain additional survey measurements for comparison with the RFETS measurements to ensure proper correlation of survey data.

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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Date/Time: January 24, 2000, 2:45 p.m.

Site Contact(s):     Sandy MacLeod, RFFO                     X3367  
                         Randy Walker, K-H                         X8269  
                         Carolyn Hicks, S.M. Stoller/RMRS             X5773  
                         Randy Leitner, PE/K-H                         X3537  
                         Catherine Madore, ECS/PE/K-H                     X3692

Regulatory Contacts: Edd Kray                                 X2115  
                         Chris Gilbreath     X6687

Agency:                 CDPHE

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**Purpose of Contact:** On January 13, 2000 Randy Walker, Sandi MacLeod, Randy Leitner, and Carolyn Hicks met with Edd Kray to discuss the removal of approximately 10 feet of ancillary piping associated with RCRA Units 95.015 and 95.016 (Tanks T-1 and T-2). As documented in the contact record prepared by Randy Walker (January 13, 2000, 11:30 a.m.), the parties agreed the piping could be removed in accordance with the B776/777 Decommissioning Operations Plan (DOP), with no additional modification required. Upon further examination of the closure documentation requirements described in Section 4.2.5 of the DOP, it has been determined that this agreement was in error.

The purpose of this contact record is to document the January 20, 2000 follow-up conversation between Randy Leitner and Chris Gilbreath, which resulted in a new agreement to submit a minor modification to DOP. As discussed below, this minor modification will provide for the removal of a portion of a RCRA-regulated unit prior to submittal of the unit-specific closure information required by Section 4.5.2 of the DOP. In the meantime, the 10 feet of ancillary piping may be removed under an approved IWCP work package.

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**Discussion:** As discussed at the initial meeting on January 13, 2000, the piping is subject to the Combustible Gas Monitoring Program, requiring monthly sampling, purging, and re-sampling. In addition, it has leaked in the past, and is likely to leak again. In short, it has become a nuisance, consuming precious building resources. Based on this information, and in view of the narrow scope of the removal activity (i.e., just 10 feet of 1-inch pipe), all the parties agree the pipe should be removed as soon as possible.

Pursuant to Section 4.5.2 of the B776/777 DOP, RCRA unit-specific closure information must be submitted to the lead regulatory agency (LRA) for review and approval as a minor modification to the DOP before closure activities are initiated for the unit. Removal of the ancillary piping constitutes partial closure of a RCRA-regulated unit. Therefore, the piping may not be removed unless the DOP is (1) modified to include the required unit-specific closure information, or (2) modified to change the requirement.

A minor DOP modification is currently being prepared to include unit-specific closure information for all the remaining RCRA-regulated units in B776/777. However, this modification will not be completed until mid to late February. As a result, a separate minor modification will be prepared and submitted to the LRA by February 4, 2000. This modification will provide for the removal of portions of a RCRA-regulated unit, prior to submittal of the required unit-specific closure information, upon engagement of the consultative process and approval of the LRA. This approach is consistent with Section 1.1.4 of the Decommissioning Program Plan (DPP) and will be incorporated into future DOPs.

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Contact Record Prepared by: Catherine Madore

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Distribution (via e-mail):

R.	DiSalvo	RFFO
S.	MacLeod	RFFO
G.	Schuetz	RFFO
E.	Kray	RFFO
T.	Hopkins	RMRS
B.	McPherson	RMRS
C.	Hicks	RMRS
L.	Kriz	RMRS
R.	Leitner	PE
K.	Myers	PE
F.	Phillips	K-H
D.	Shelton	K-H
K.	North	K-H
R.	Walker	K-H
S.	Rose	K-H